

# **EXHIBIT N**

Emails regarding Cobb County

**Subject:** RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County  
**Date:** Wednesday, October 6, 2021 at 2:30:55 PM Eastern Daylight Time  
**From:** Bryan Tyson  
**To:** Robert McGuire  
**CC:** Josh Belinfante, vrusso@robbsfirm.com, Bruce Brown, Cary Ichter, Cross, David D., Adam M. Sparks, Conaway, Jenna B., Jill Connors, Carey Miller, Alexander Denton, Jonathan Crumly, Marilyn Marks  
**Attachments:** image001.jpg

As I understand it, these are recount images. We'll send FTP and can arrange external media as well.

Thanks,

Bryan



**Bryan P. Tyson**

**Taylor English Duma LLP** | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7249 | M: 404.219.3160 | btyson@taylorenghish.com

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**From:** Robert McGuire <ram@lawram.com>

**Sent:** Wednesday, October 6, 2021 1:05 PM

**To:** Bryan Tyson <btyson@taylorenghish.com>

**Cc:** Josh Belinfante <Josh.Belinfante@robbsfirm.com>; vrusso@robbsfirm.com; Bruce Brown

<bbrown@brucepbrownlaw.com>; Cary Ichter <Clichter@IchterDavis.com>; Cross, David D.

<DCross@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B.

<JConaway@mofo.com>; Jill Connors <JConnors@IchterDavis.com>; Carey Miller

<carey.miller@robbsfirm.com>; Alexander Denton <Alexander.Denton@robbsfirm.com>; Jonathan

Crumly <jcrumly@taylorenghish.com>; Marilyn Marks <Marilyn@USCGG.org>

**Subject:** RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Bryan, thanks.

What images are represented in what you are sending, original count or the recount?

Also, we would appreciate receiving these both by ftp and external media to Jill Connors in Cary's office.

Thank you.

Best,  
Robert McGuire

ROBERT A. MCGUIRE, III

\*\*\* NOTE NEW CONTACT DETAILS BELOW \*\*\*

SHAREHOLDER | THE ROBERT MCGUIRE LAW FIRM

1624 MARKET ST STE 226 #86685, DENVER, CO 80202-2523 | 113 CHERRY ST #86685, SEATTLE, WA 98104-2205

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---

**From:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>

**Sent:** Wednesday, October 6, 2021 7:46 AM

**To:** Robert McGuire <[ram@lawram.com](mailto:ram@lawram.com)>

**Cc:** Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com); Bruce Brown <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>; Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>; Adam M. Sparks <[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)>; Conaway, Jenna B. <[JConaway@mofo.com](mailto:JConaway@mofo.com)>; Jill Connors <[JConnors@IchterDavis.com](mailto:JConnors@IchterDavis.com)>; Carey Miller <[carey.miller@robbinsfirm.com](mailto:carey.miller@robbinsfirm.com)>; Alexander Denton <[Alexander.Denton@robbinsfirm.com](mailto:Alexander.Denton@robbinsfirm.com)>; Jonathan Crumly <[jcrumly@taylorenghish.com](mailto:jcrumly@taylorenghish.com)>

**Subject:** RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Robert,

At our request after receiving this additional information from Cobb County, the Secretary's office searched again and was able to locate additional USB drives received from Cobb County that contained ballot images. Those drives contain a total of 324,886 additional ballot images. These images were not in the election project files but were stored separately on USB drives. The SOS staff is in the process of downloading those images into a format we can send to you and we will produce them as soon as we receive them from the Secretary's office.

I have removed Ms. Marks from this response.

Thanks,

Bryan



**Bryan P. Tyson**

**Taylor English Duma LLP** | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7249 | M: 404.219.3160 | [btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)

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**From:** Robert McGuire <[ram@lawram.com](mailto:ram@lawram.com)>

**Sent:** Tuesday, October 5, 2021 1:35 PM

**To:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>

**Cc:** Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com); Bruce Brown

<[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; Cary Ichter <[Cichter@IchterDavis.com](mailto:Cichter@IchterDavis.com)>; Cross, David D.

<[DCross@mofo.com](mailto:DCross@mofo.com)>; Adam M. Sparks <[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)>; Conaway, Jenna B.

<[JConaway@mofo.com](mailto:JConaway@mofo.com)>; Marilyn Marks <[Marilyn@USCGG.org](mailto:Marilyn@USCGG.org)>; Jill Connors <[JConnors@IchterDavis.com](mailto:JConnors@IchterDavis.com)>

**Subject:** RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Bryan,

Coalition Plaintiffs have requested the November ballot images, but we have received only 71,000 recount images, which means that nearly 400,000 images are missing from the original count and over 300,000 are missing from the recount.

Daniel White's email below states that *all* ballot images were delivered to the SOS.

Based on your mail of September 17, we assume that your client does not presently have possession of the images or copies. Please let us know the status of this request for Cobb's images in the possession of the Secretary's office. We need to promptly obtain a definitive answer on whether the images were preserved.

Thank you.

Best,



Robert McGuire

ROBERT A. MCGUIRE, III

\*\*\* NOTE NEW CONTACT DETAILS BELOW \*\*\*

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---

**From:** Daniel White <[dwhite@hlw-law.com](mailto:dwhite@hlw-law.com)>

**Sent:** Tuesday, October 5, 2021 7:22 AM

**To:** Jill Connors <[JConnors@IchterDavis.com](mailto:JConnors@IchterDavis.com)>

**Cc:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>; Robert McGuire <[ram@lawram.com](mailto:ram@lawram.com)>; Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com); Bruce Brown <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>; Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>; Adam M. Sparks <[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)>; Conaway, Jenna B. <[JConaway@mofo.com](mailto:JConaway@mofo.com)>; Marilyn Marks <[Marilyn@USCGG.org](mailto:Marilyn@USCGG.org)>

**Subject:** RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Jill, after the November 2020 election and recount the Cobb County Elections Department turned all ballot images over to the Secretary of State's Office, and did not retain any of those images in its own records. Even though my client did not have those images in its possession, after receiving your subpoena Cobb inquired with the Secretary of State about retrieving copies in a good faith effort to comply with the subpoena. The images on the drives are only what was given to us by the Secretary of State.

Daniel W. White

Haynie, Litchfield & White, PC

222 Washington Ave.

Marietta, Georgia 30060

770-422-8901 (direct dial)

---

**From:** Jill Connors

**Sent:** Thursday, September 30, 2021 12:35 PM

**To:** Daniel White <[dwhite@hlw-law.com](mailto:dwhite@hlw-law.com)>

**Cc:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>; Rob McGuire <[ram@lawram.com](mailto:ram@lawram.com)>; Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com); Bruce Brown <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>; Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>; Adam M. Sparks <[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)>; Conaway, Jenna B. <[JConaway@mofo.com](mailto:JConaway@mofo.com)>; Marilyn Marks <[Marilyn@USCGG.org](mailto:Marilyn@USCGG.org)>

**Subject:** RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Good Afternoon, Daniel,

I am writing to follow up on my email below. Can you please update me as to the status of this?

Thank you.

**Jill Connors, JD - Paralegal**  
**Ichter Davis LLC**

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**From:** Jill Connors  
**Sent:** Friday, September 24, 2021 1:08 PM  
**To:** Daniel White <[dwhite@hlw-law.com](mailto:dwhite@hlw-law.com)>  
**Cc:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>; Rob McGuire <[ram@lawram.com](mailto:ram@lawram.com)>; Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com); Bruce Brown <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>; Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>; Adam M. Sparks <[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)>; Conaway, Jenna B. <[JConaway@mofo.com](mailto:JConaway@mofo.com)>  
**Subject:** Re: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Daniel,

I hope this email finds you well. I am writing to follow up on the production of Cobb ballot images. After reviewing the USB drives and links provided, we found that (1) they did not include images of the original count, and (2) they included only 71,000 images from the recount, while over 400,000 recount images were anticipated. Accordingly, we request that the full inventory of ballot images for the two counts be promptly provided, or confirmation that no other images were preserved.

Please let me know if you have any questions.

Thank you.

**Jill Connors, JD - Paralegal**  
**Ichter Davis LLC**

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**From:** Jill Connors <[JConnors@IchterDavis.com](mailto:JConnors@IchterDavis.com)>

**Sent:** Friday, September 17, 2021 2:03 PM

**To:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>; Robert McGuire <[ram@lawram.com](mailto:ram@lawram.com)>

**Cc:** Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com); Bruce Brown <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>; Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>; Adam M. Sparks <[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)>; Conaway, Jenna B. <[JConaway@mofo.com](mailto:JConaway@mofo.com)>

**Subject:** RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Much appreciated.

**Jill Connors, JD - Paralegal**  
**Ichter Davis LLC**

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---

**From:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>

**Sent:** Friday, September 17, 2021 4:20 PM

**To:** Jill Connors <[JConnors@IchterDavis.com](mailto:JConnors@IchterDavis.com)>; Robert McGuire <[ram@lawram.com](mailto:ram@lawram.com)>

**Cc:** Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com); Bruce Brown <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>; Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>; Adam M. Sparks <[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)>; Conaway, Jenna B. <[JConaway@mofo.com](mailto:JConaway@mofo.com)>

**Subject:** RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Jill,

What I sent you is what I received from the Secretary's office. I'll check with them and see, but am not sure if they would receive both sets of images from November or not. I'll let you know what I find out.

Thanks,

Bryan



**Bryan P. Tyson**

**Taylor English Duma LLP** | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

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**From:** Jill Connors <[JConnors@IchterDavis.com](mailto:JConnors@IchterDavis.com)>

**Sent:** Friday, September 17, 2021 3:59 PM

**To:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>; Robert McGuire <[ram@lawram.com](mailto:ram@lawram.com)>

**Cc:** Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com); Bruce Brown

<[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>; Cross, David D.

<[DCross@mofo.com](mailto:DCross@mofo.com)>; Adam M. Sparks <[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)>; Conaway, Jenna B.

<[JConaway@mofo.com](mailto:JConaway@mofo.com)>

**Subject:** RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Good Afternoon, Bryan:

Our team has taken an initial look at the files included in the link you sent yesterday. Unless we failed to complete the entire upload (there was a significant amount of data which can cause errors in the upload), it appears that only the recount files were included in the link as opposed to all images from the November original count and the machine recount. Please advise as to whether we are mistaken; and if not, how we can obtain the full inventory of Cobb County ballot images for the November election.

Thank you for your time and attention to this matter.

**Jill Connors, JD - Paralegal**  
**Ichter Davis LLC**

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---

**From:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>

**Sent:** Thursday, September 16, 2021 2:47 PM

**To:** Robert McGuire <[ram@lawram.com](mailto:ram@lawram.com)>

**Cc:** Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com); Bruce Brown

<[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>; Jill Connors

<[JConnors@IchterDavis.com](mailto:JConnors@IchterDavis.com)>



**Subject:** RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Rob and Jill,

The ballot images have been uploaded to this link:

<https://taylorenghishduma.sharefile.com/i/if9f905bc6f448598>

Let us know if you have any trouble accessing them.

Thanks,

Bryan



**Bryan P. Tyson**

**Taylor English Duma LLP** | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

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**From:** Robert McGuire <[ram@lawram.com](mailto:ram@lawram.com)>

**Sent:** Thursday, September 16, 2021 12:34 PM

**To:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>

**Cc:** Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com); Bruce Brown <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; Cary Ichter <[Cichter@ichterdavis.com](mailto:Cichter@ichterdavis.com)>; Jill Connors <[JConnors@ichterdavis.com](mailto:JConnors@ichterdavis.com)>; Marilyn Marks <[Marilyn@uscgg.org](mailto:Marilyn@uscgg.org)>

**Subject:** RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Thanks, Bryan. Please send the images to Jill Connors, copied.

Best,

Rob

ROBERT A. MCGUIRE, III

\*\*\* NOTE NEW CONTACT DETAILS BELOW \*\*\*

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---

**From:** Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>

**Sent:** Wednesday, September 15, 2021 1:55 PM

**To:** Robert McGuire <[ram@lawram.com](mailto:ram@lawram.com)>

**Cc:** Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com); Bruce Brown <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; Cary Ichter <[Clichter@ichterdavis.com](mailto:Clichter@ichterdavis.com)>; Jill Connors <[JConnors@ichterdavis.com](mailto:JConnors@ichterdavis.com)>; Marilyn Marks <[Marilyn@uscgg.org](mailto:Marilyn@uscgg.org)>

**Subject:** Re: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Robert,

We have discussed this with the Secretary's office and Cobb County did not include their ballot images with their Election Project files, but sent them under separate cover. A group from Cobb County Elections picked up a copy of their ballot images this afternoon and we can likely get a copy of those images tomorrow to send to you.

Thanks,

Bryan

Bryan P. Tyson

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On Sep 15, 2021, at 12:55 PM, Robert McGuire <[ram@lawram.com](mailto:ram@lawram.com)> wrote:

Bryan,

Please see the highlighting below in an email from Cobb County regarding our subpoena for election project files, specifically the ballot images. Daniel White tells us these images have been sent to the State.

Can you please check with the Secretary's folks and arrange for the Cobb ballot image files either to be sent to Jill Connors (copied), or else put on an FTP download site with a link where we can download them?

Thank you.

Best,  
Robert McGuire

ROBERT A. MCGUIRE, III

\*\*\* NOTE NEW CONTACT DETAILS BELOW \*\*\*

SHAREHOLDER | THE ROBERT MCGUIRE LAW FIRM

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**From:** Daniel White <[dwhite@hlw-law.com](mailto:dwhite@hlw-law.com)>

**Sent:** Wednesday, September 15, 2021 7:57 AM

**To:** Jill Connors <[JConnors@IchterDavis.com](mailto:JConnors@IchterDavis.com)>

**Cc:** Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>; Bruce Brown <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>;

Robert McGuire <[ram@lawram.com](mailto:ram@lawram.com)>; Gregg Litchfield <[gel@hlw-law.com](mailto:gel@hlw-law.com)>; Eveler, Janine

<[Janine.Eveler@cobbcounty.org](mailto:Janine.Eveler@cobbcounty.org)>

**Subject:** RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Jill,

As I mentioned yesterday, the attorney in the Cobb County Attorney's office who was monitoring this case, Elizabeth Monyak, is out on FMLA leave. Because of her absence and my familiarity with this case, the County has asked me to assist you with this request.

Janine Eveler forwarded your email and subpoena earlier this week and have been coordinating with her regarding what documents Cobb BoE has in its possession. After talking with her about



the requested items, it appears that we do have copies of the Election Project files that we can provide on a flash drive, I just need a day or two to review them, mark them confidential, and add Bates numbering. We do not currently have possession of any ballot images from the election, and any ballot images from the recount were submitted directly to the Secretary of State on the original flash drives. The county does intend to retrieve copies of those images at some point in the near future, but at the present time those documents are not in the county's possession.

Per our conversation this morning, I will agree to accept service of the subpoena on behalf of Janine if Plaintiffs are willing to give us until Friday to provide you with the flash drive containing the marked and Bates stamped-documents. Additionally, if/when Cobb BoE obtains any of the ballot images you've requested, we will agree to send copies to you if the state has not already done so (provided there is no protective order or agreement excluding them).

Please reply at your earliest convenience and confirm our extension of time to respond to the subpoena.

Daniel W. White  
Haynie, Litchfield & White, PC  
222 Washington Ave.  
Marietta, Georgia 30060  
770-422-8901 (direct dial)

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**From:**

**Sent:** Friday, September 10, 2021 1:10 PM

**To:** Monyak, Elizabeth <[Elizabeth.Monyak@cobbcounty.org](mailto:Elizabeth.Monyak@cobbcounty.org)>

**Cc:**

**Subject:** Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Good afternoon, Ms. Monyak,

As you may recall, Cary Ichter, along with Bruce Brown, represents the Coalition Plaintiffs in Curling v. Raffensperger, currently pending in the United States District Court for the Northern District of Georgia. On Cary's behalf, I have attached a pdf of a subpoena to Cobb County for documents – specifically, "Election Project files, including all ballot images, for the November 3, 2020 election and the recount."

We would like to avoid the trouble and expense of personally serving this subpoena and also work out the logistics for the actual production of the documents. Will you accept service of the subpoena?

Thank you and I look forward to hearing from you.

And – Cary says “Hi!”

**Jill Connors, JD - Paralegal**

**Ichter Davis LLC**

3340 Peachtree Road NE

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[jconnors@ichterdavis.com](mailto:jconnors@ichterdavis.com)

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